

BLANK ROME LLP  
Attorneys for Third-Party Defendants  
Jeremy J.O. Harwood (JH 9012)  
405 Lexington Avenue  
The Chrysler Building  
New York, NY 10174  
(212) 885-5000

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNDERWRITERS AT LLOYDS a/s/o  
YOUNGLIN B & A CO., LTD.,  
Plaintiff,

07 Civ. 6628 (PAC)

-against-

OCEAN WORLD LINES, INC.,  
Defendant.

---

OCEAN WORLD LINES, INC.,  
Third-Party Plaintiff,

-against-

ANL CONTAINER LINE PTY LIMITED t/a  
ANL; ANL SINGAPORE PTE LTD.,  
Third-Party Defendants.

**REPLY MEMORANDUM OF LAW OF ANL  
CONTAINER LINE PTY LIMITED T/A ANL AND ANL  
SINGAPORE PTE LTD. IN SUPPORT OF MOTION TO  
COMPEL ARBITRATION AND FOR A STAY**

---

*Jeremy J.O. Harwood  
Blank Rome LLP  
The Chrysler Building  
405 Lexington Avenue  
New York, NY 10175  
212-885-5000*

## **PRELIMINARY STATEMENT**

Defendants ANL CONTAINER LINE PTY LIMITED t/a ANL and ANL SINGAPORE PTE LTD. (collectively "ANL") submit this reply memorandum of law in support of its motion to compel arbitration and for a stay in response to the affidavit of Plaintiff's counsel dated April 18, 2008 ("Campiese Affidavit").

## **ARGUMENT**

### **POINT I**

#### **ANL IS ENTITLED TO RECOGNITION OF ITS ARBITRATION RIGHTS IRRESPECTIVE OF THE SUM IN DISPUTE**

Following the Court conference ANL was advised of the threat of sanctions if it sought to enforce its rights, recognized as a U.S. Treaty obligation. The Supreme Court in Preston v. Ferrer, \_\_\_ U.S. \_\_\_, 128 S. Ct. 978, 169 L. Ed.2d 917 (2008) has recently provided a reminder of the policy favoring arbitration.

### **POINT II**

#### **THE CAMPIESE AFFIDAVIT FAILS TO ADDRESS THE GROUNDS FOR STAYING THE ENTIRE ACTION**

The Campiese Affidavit contains impermissible legal argument with addressing the grounds for staying the entire action. Louis Dreyfus Negoce S.A. v. Blystad Shipping & Trading, Inc., 88 F. Supp.2d 168 (S.D.N.Y. 2000) aff'd, 252 F.3d 218, 224 (2d Cir. 2001).

The Campiese Affidavit acknowledges that “Plaintiff was not in [contractual] priority with [ANL]” for which reason ANL was not originally named. Id., ¶ 11. Plaintiff fails to allege any cause of action against ANL.

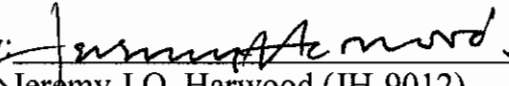
**CONCLUSION**

ANL respectfully requests that its motion to compel arbitration and to dismiss the complaint against it pursuant to 9 U.S.C. § 4 be granted; that a stay of the entire action be granted under 9 U.S.C. § 3 and for such other relief as may be equitable.

Dated: New York, New York  
April 21, 2008

Respectfully submitted,

BLANK ROME LLP  
Attorneys For Third-Party Defendants

By:   
Jeremy J.O. Harwood (JH-9012)  
A Member of the Firm  
405 Lexington Avenue  
The Chrysler Building  
New York, NY 10174  
(212) 885-5000